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HIGH SEAS STATION W.A.H. VIRGIN ISLANDS RADIO
MARITIME ACCOUNTING AUTHORITY AACI US14
GLOBAL COMMUNICATIONS CORP

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Post Office Box 7009
Saint Thomas, U.S. Virgin Islands, 00801
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8 February 1994

The Secretary,
Federal Communications Commission
Washington, DC 20554

This is to introduce Global Communications Corporation's
response to MD Docket No. 93-297.

I have prepared this response in house because we feel that
what we have to offer is our own hands on experience. It is our
hope that this goal has been achieved and that our response is
valuable and useful to the Commission.

Our response may in fact be quite unique in that I know of
no other accounting authorities that are also coast stations.

I apologize for the lateness of our reply. This is in part
because we received notice of this rule making only on
17 January 1994. Immediately upon receiving notice I contacted
the ITU to confirm that we had on hand the latest rules and
recommendations. After two overnight express shipments from
Switzerland I confirmed that we did in fact have the most recent
data on hand already.

Sincerely,


Peter D. Church
President

PDC:pdg

Attached:

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Text of Global's reply
Letter from GR05

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Global Communications Corporation
Response to MD Docket No. 93-297

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Office of the Secretary
Federal Communications Commission,
Washington, DC 20554

REFERENCE: MD Docket No. 93-297
Global Communications Corporation
High Seas Radiotelephone Station WAH
AAIC US14

1 Global Communications is both a High Seas Radiotelephone Station (Call Sign WAH¹) and an Accounting Authority (AAIC US14²). As a High Seas Station we accept billing to accounting authorities by vessels of all nationalities and as an accounting authority we are responsible for various vessels. This combination of responsibilities and experience, we believe may provide an especially useful point of view for this proceeding.

2 Our response to and considerations about MD Docket No. 93-297 and the newly proposed, CFR 47 Section 3 is divided in to two parts. The first part relates our experiences as a High Seas Station and our efforts to verify the accounting authority eligibility of vessels, the subsequent collection funds and our experiences as an accounting authority. The second part discusses our recommendations based on our experiences and our recommendations regarding the proposed rule making at hand.

1. WAH's alternate callsign is Virgin Islands Radio.

2. AAIC US14 is assigned to Global Communications Corp. US Virgin Islands.

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PART ONE:
GLOBAL COMMUNICATIONS CORPORATION
AAIC US14
Call Sign WAH/VIRGIN ISLANDS RADIO
RESPONSE TO MD Docket No. 93-297

3 GLOBAL'S EXPERIENCES AS A HIGH SEAS RADIOTELEPHONE
STATION REGARDING VERIFYING VESSELS AND COLLECTING FUNDS
FROM OTHER ACCOUNTING AUTHORITIES.

4 Currently Global has 82 active files on foreign accounting authorities. We accept all accounting authorities except those that we are completely unable to collect from. Collecting from some that we accept can be quite a chore though.

4.1 There are many more valid accounting codes than 82, we simply retire a file if it has not been used in one year and reactivate it again if it is requested by a vessel at a later time. Some times a code has only been used once, this by the way creates special problems which will be mentioned under collection procedures.¹

1. This is discussed in paragraph 8.7 .

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5 A GENERAL DESCRIPTION OF THE CYCLE OF A VESSEL BILLING
TO AN ACCOUNTING AUTHORITY.

5.1 A vessel calls "WAH / Virgin Islands Radio"¹ and requests to bill a telephone call to their accounting authority. We get the vessel's name, callsign, and accounting code. Next this information is verified by going to the list of valid vessels accepted by that accounting authority. If this all checks out we place the call for the vessel and bill it to the accounting code.

5.2 Each month accounting authorities that we have charges for are invoiced per ITU standards. The invoices are sent by international air mail to the respective authorities. We request that the authorities acknowledge receipt of our invoices so that we are sure that they have been received. It is extremely helpful if along with this acknowledgement or within one month that we also receive notice of any rejections. When the authority pays the invoice it is also very helpful if they state at that time which invoices are being paid.

1. Virgin Islands Radio is the WAH/Global Communications Corp. alternate call sign.

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6 VERIFICATION OF VESSELS. This can be very easy or in some cases not possible at all depending largely on the authorities providing readable and accurate lists of vessels accepted.

6.1 Accounting codes such as NO01 (Norwegian PTT¹), BE02 (SAIT²) are a pleasure to do business with. Doing business with an accounting code easily, depends upon:

6.2 The accounting authority must publish a complete list of vessels accepted including starting and stopping dates and keeping this list up to date at least quarterly, though preferably monthly or publishing changes quickly when they occur. The list should state for how long it is valid, hence we then know when we can expect an update. We carefully keep track of this, for it is our only check on the validity of our data aside from having our charges rejected at a later date.

6.3 BE02 (SAIT) is an example of an accounting code that publishes complete new lists every two months and sends an update the month in between.

6.4 NO01 (The Norwegian Government PTT) accepts all Norwegian call signs. This naturally makes the situation very easy but also does not seem to relate to this rule making, unless there was some way for a private accounting authority to collect from a US call sign with out a signed contract.

1. PTT = Public Telephone & Telegraph.

2. AAIC BE02 is assigned to SAIT Communications, Brussels, Belgium.

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6.5 DP02¹ supplies their list on floppy disk. This makes it vastly easier to verify their vessels. They are the only accounting authority, that we know of, that does this.

6.6 All other authorities that publish a list send it by the postal service to us in printed form. Sometimes simply a stack of computer paper 100 pages or more long. We have cases where the 4th carbon copy has been received by us. This makes it not even possible to scan it into our computers, so we have no choice other than to use it manually.

6.7 If our operator makes an error in reading a list like this and we accept charges they will naturally be rejected and we must accept the loss. Our other choice might be to refuse the authority in question, but this may conflict with the requirement that we accept all accounting authorities. Also it conflicts with our desire to be the providers of the service wished by the vessel.

6.8 Whenever we must use a manual list to determine the eligibility of a vessel, it delays the service to the vessel by 3 to 4 minutes and adds to the cost of delivering the service. Currently there is no additional charge for this added cost.

6.9 The other method of verifying a vessel is to refer to The International Telecommunications Union's "List of Ships Stations"². This volume is published once a year and

1. AAIC DP02 is assigned to DEBEG GmbH, Hamburg, Germany.

2. The "List of Ships Stations" is published by the International Telecommunications Union, Geneva, Switzerland.

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updated quarterly. Unfortunately it is often out of date for there is a delay in reporting changes to the ITU and then a commlag to the next update. Plus some of the entries are totally in error, possibly because the country of registry does not report changes to the ITU¹.

6.10 The "List of Ships Stations" is comprised of two volumes totaling 2657 pages. This list also is not available in a computer format, it is available only in printed form.

6.11 Currently it seems that authorities only send the ships stations list that they are responsible for upon request. After the first request about one half of them follow up with updates, the remainder must be reminded to send updates.

6.12 It is equally important, that the accounting authority upon receiving our invoice acknowledge receipt and quickly indicate to us the vessels that they will take responsibility for and the vessels that they reject, plus the reason for the rejection. Sometimes even though we have researched the vessel an error has occurred, either in the documents that we have on hand or we received the updates late due to international postal delays. Quick rejection then makes it easier to re-invoice the charges.

6.13 We have had cases of an accounting code error due to postal delays in receiving updates to the accepted ships lists. After accepting a vessel, we find that the vessel is with another authority. We then bill the new authority only to find that they have, (say for non payment) been dropped, and that the vessel is now with a third accounting

1. ITU = International Telecommunication Union.

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authority. If each authority delays and uses the full 6 months to inform us a year plus postal delays will pass.

6.14 We currently have a case of a vessel skipping between accounting authorities, with the first authority going bankrupt. The traffic was accepted by us from vessels registered to GB10¹ and sent to GB10. GB10 in the meantime went bankrupt. The vessel then signed with GB06², but GB06 dropped the vessels for nonpayment. Technically GB06 was not responsible to settle with us because the traffic was placed prior to their assuming responsibility for the vessels. But our experience is that authorities are willing to cooperate and will ask the owners or operators of a vessel to pay valid outstanding debits, with the authority paying us upon collection. GB06 first in this case provided us with address in Hong Kong and then addresses in Pakistan when it was discovered that the vessels company had in the mean time moved. The Lloyds Registry listed only the old address in Hong Kong. Data on GB10's unpaid account attached.

6.15 The vast majority of smaller authorities in the world do not publish lists.

6.16 All authorities when they drop a vessel willingly provide us with the AAIC Code that the vessel moves to if it is known. If the new code is not known then problems can develop. A few authorities, but definitely a minority, will then provide us with the name of the owners or operators so

1. AAIC GB10 was assigned to Electro-Nav International Ltd. London, England.

2. AAIC GB06 is assigned to Peninsular Electronics Limited, Bristol, England.

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we can direct bill our charges. An authority is more likely to do this if they themselves have been paid, but if this is the case the vessel and operator/owner generally has lots of others also looking for them and there is nothing left by the time we get to them.

6.17 Accounting authorities that are unwilling to give us the names of the operator/owners of a vessel usually cite secrecy of communication laws and rules as their reason for not divulging this information. We are not at all sure that this is a valid response, and tend to see it more as to reduce the competition for the remaining assets of the vessel or as general corporate rules of not divulging any information at all to outsiders.

6.18 There is a considerable risk to the coast station if a call is accepted against an accounting authority that does not publish and keep up to date accurately a list of vessels that it is responsible for. The exception to this are National accounting authorities such as NO01 (The Norwegian PTT), FR01¹ (The French PTT), & GB14² (The English PTT) that also do not publish lists since they accept all of their own callsigns. But with GB14 there is sometimes a problem. They will, at times, reject a British callsign. So far when we have protested they have relented. GB14 has at times replied to us that they will only pay us when and after they have been paid by their subscriber.

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1. AAIC FR01 is assigned to France Telecom DTRE, Paris, France.
 2. AAIC GB14 is assigned to British Telecom, London, England.

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- 6.19 It is our understanding that US01¹ (The FCC) accepts billing for all US registry vessels in a manner similar to foreign PTT's. This does not seem relevant to this rule making though.
- 6.20 We have had a few cases of outright fraud, but not many. One case involved the use of an accounting code by a vessel that placed via VHF (Definitely a short range service.) phone calls. When we billed this traffic we were informed that the real vessel by that name and callsign was at anchor at the mouth of the Suez Canal and had not moved for more than a year.
- 6.21 We find it surprising that there is very little fraud in the use of accounting codes. The system has no internal security at all. Most likely the reason for so little fraud is that very little information is known publicly about it. The main weakness in its security is not the verification of a particular vessel, but the ease that a valid code can be used by a vessel that it is not assigned to.
- 6.22 Another point we note is that very few US coast stations seem to accept accounting authorities. We have no hard facts on this but it is the impression we have formed over the last 13 years when talking with other stations. It would be interesting if the FCC were to survey the licensees.

1. AAIC US01 is assigned to International Telecommunications Settlements Section (Maritime), Federal Communications Commission, Gettysburg, USA.

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6.23 For an accounting authority system to work both within and outside the United States it is necessary for vessels to be able to use it. We attribute part of our slow growth as an accounting authority to this.

6.24 The major coast stations (High Seas Stations) do accept AAIC's but we feel most of the rest do not.

7 GLOBAL'S EXPERIENCES WITH ACCOUNTING AUTHORITIES
THAT ARE SLOW PAYING OR HAVE NEVER PAID.

7.1 Currently we have invoices pending with 6 authorities that we classify as slow paying, none of them are US AAIC's. By slow paying we mean that they exceed the ITU standards of paying an account in 6 months or less.

7.2 We also have never been paid by a total of 10 authorities over the last 13 years. We don't accept traffic for this list and we inform the ships desiring to use the authority why. We do this so as to avoid conflict between our operator and the Radio Officer of the vessel and partly in the hope that the vessel will complain to the authority. Maybe then after enough complaints, they will finally pay.

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8 PAYMENT AND TRANSFER OF FUNDS PROBLEMS RELATING TO ALL
ACCOUNTING AUTHORITIES.

8.1 The problems relating to international currency transfers have resulted in our requesting that all accounting authorities pay us in US dollars drawn on a bank having offices in the US. The bank must also conform to all US banking standards.

8.2 Traditionally we have always been paid by check or bank transfer. We have never had an accounting authority even offer or suggest the use of Special Drawing Rights, SDR's, nor in our experience as an accounting authority ourselves have we ever been requested to remit by the use of SDR's. We have always paid by draft, either in US Dollars or the national currency of the authority owed, or by check in US Dollars if so requested.

8.3 We have requested of foreign accounting authorities that they remit in one of two ways:

(a) By check drawn on a bank with US offices that conforms to all US banking standards. Often the problem is that the bank in question cannot issue a check with the bank identification numbers in the upper right hand corner. This seems to be a problem for many foreign banks with offices in the US.

(b) By direct transfer to a bank account that we use only for this purpose. We provide the authorities with the complete cable address of our account. The funds must be in US dollars.

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- 8.4 ITU recommendations state that all expenses incurred at the receiving end are to the account of the accounting authority or radio station receiving the funds.
- 8.5 Hence the reasons why we request the above methods of payments is to control the cost of collecting the funds. A non US check or a check in non US funds costs us between \$20.00 and \$40.00 in bank fees because the check must be sent for "collection". Also there is then an additional delay of two or more weeks. A bank transfer in non US funds causes similar collection expenses and a number of US banks will not accept foreign funds.
- 8.6 While a cost of \$20.00 to \$40.00 may not seem much, the sheer number of authorities makes it likely that in the course of a month a station may have as many as 10 single call billings to separate authorities. These calls, if billed, will incur collection charges in excess of the value billed, making it pointless to bill them in the first place. The choice then is does one provide the service for free, or not provide it at all ? One naturally provides it and does ones best to persuade the authority in question to absorb the cost at their end.

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- 8.7 As an example of the costs on the other end (To the accounting authority originating payment to us), we attach a response from GR05 to us. So as to control the costs at their end, they prefer not to make payments of less than \$200.00. They indicate it is not cost effective for them to indicate transfers of less than that amount. We are willing for an authority to delay payment for these reasons and always grant the requests when received. The important requirement is that we get an acknowledgement and request for delay, that way we know that our invoice has not been ignored or lost. Plus we now know when to expect payment.

Note: Letter received from GR05 attached at the end of this reply.

- 8.8 We ourselves, within the limits of the ITU recommendations, will delay invoicing if the amount is small. Often we can accumulate a few more calls by a short delay making it profitable for both us and the authority billed to process the transaction.

9 PROBLEMS REGARDING FIGURING OUT EXACTLY WHAT INVOICES WE ARE BEING PAID FOR.

- 9.1 As strange as this title sounds, we often experience considerable confusion upon receiving a payment in determining to which accounting authority and which invoices of that authority the payment is to be applied to.

- 9.2 Very few authorities when paying, detail in a cover letter exactly what invoices are being paid.

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9.3 It is general practice among accounting authorities to lump payments covering several months of our billing together, for the reason stated in paragraph 8.7 . This alone is confusing for payments are sometimes not made in the same sequence that we invoice them. This, plus the payment, almost never matches our invoice amount due to currency conversion differences. Also if the originating authority does not follow our requests regarding how they pay us, there will be unknown collection fees between the intermediate banks.

9.4 It is also almost always our experience on bank transfers and very often when we receive a check, for the authority paying us to not include a cover letter that states our original invoice numbers. On bank transfers our bank generally only knows the name of the bank and country that the payment originated from not the name of the originating authority. Authorities also sometimes bank in a different country than the authority is located in or the authority operates several AAIC's in different countries and payments are made it sometimes seems at random for each other. We note that we use Barclays NA and Banco Popular, Puerto Rico. One well know internationally and the other, the largest regional bank in this area. Plus we have reviewed the documents of transfer our selves.

9.5 Thus when we have outstanding invoices with more than one authority in a country, or the authority operates more than one AAIC, we must contact each one until this is resolved. Namely paragraphs 9.2 , 9.3 and 9.4 combine to create a situation requiring additional time to untangle. We have at times also credited the wrong authority for a payment as a result of this lack of attention to the details.

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We wonder if this is not the result of the parent company deriving only a small portion of their earnings from the activity of settling accounts. The national PTT's in the style of European governments are all very precise and detailed in their payments. Though not always on time!

10 GLOBAL'S EXPERIENCES AS AN ACCOUNTING AUTHORITY.

10.1 We have operated as an accounting authority for three years. Our customers are generally private vessels and local commercial vessels.

10.2 Although we have only been officially an accounting authority for three years, we have in essence performed the services of an accounting authority for more than 12 years. Locally in the Caribbean it seems that non USA coast stations are willing to accept traffic to be billed to us if the vessel states that they are registered as a customer with us. Any vessel that has a direct billing contract with us falls into this category. The billing contract was and is intended to cover only services delivered directly by WAH / Virgin Islands Radio to the particular vessel signed up with us.

10.3 Tortola Radio¹, British Virgin Islands (Located 20 nm to the east of us), Saba Radio², Saba Island, Netherlands Antilles (Located 100 nm to the east of us) and Lands Radio, Willemstad Curacao, Netherlands Antilles (Located 600 nm

1. Tortola Radio, Tortola, British Virgin Islands uses its location as its callsign.

2. Saba Radio, Saba Island, Netherlands Antilles uses as its callsign PJS.

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south of us) have all accepted vessels billing to us prior to our being an accounting authority. Incidentally Lands Radio is also the national accounting authority for the Netherlands, NA01.

10.4 We have always settled with these stations, usually sending payment in less than 60 days. There have also been cases where the vessel claimed to be registered locally with us and was not. In these cases we have generally been able to settle anyway. The Caribbean is a small place, someone we know always seems to know or be able to find out the name of the owners of the vessel, and then we bill them and rarely have we not collected.

10.5 Once we collect we settle unofficial accounts like this immediately, this way preserving the trust that we and our customers enjoy and thus possibly perpetuating unintentionally this activity.

10.6 Currently we know of no way to be certain that a vessel applying to be listed with us under US14 has no outstanding AAIC debts. The search for this information begins by checking the ITU List of Ships Stations and checking the Lloyds Registry (To discover the name and callsign history of the vessel) and then checking with the past AAIC's for that vessel under its past, various and different names and callsigns. The difficulty is both of these sources have substantial quantities of errors, especially if the vessel has signed in the past with an authority out side of Europe or the US.

10.7 Commercial vessels change names, callsigns and countries of registry at remarkably high rates.

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10.8 Our further experiences as an accounting authority have been uneventful and gone smoothly. It must be noted though that we handle very few vessels and that this side of our business has grown slower than expected.

10.9 We have patterned our charges after US02, BE02, and GB06. Also if the applicant is also registered locally with us and has demonstrated good payment performance we tend to follow GB06's example of requiring the value of 3 months expected traffic for a deposit, rather than BE02's requirement of a deposit of \$5000.00 per vessel.

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11 THIS CONCLUDES THE FIRST PART OF OUR RESPONSE.
WE FOLLOW NOW WITH OUR RECOMMENDATIONS WITH REGARD TO
THIS PROPOSED RULE MAKING.

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12 GLOBAL COMMUNICATIONS CORPORATION RESPONDS TO
MD Docket No. 93-297 AND RECOMMENDS THE FOLLOWING
ADDITIONS AND CHANGES TO THE NEW CFR 47 SECTION 3.

12.1 We in general recommend more attention to detail re-
gards the day to day operations of an accounting authority
than MD Docket No. 93-297 and the proposed CFR 47 Section 3
in the appendix, of this rule making goes into.

12.2 Our desire to see more attention to detail directly
stems from our experiences as a High Seas Radiotelephone
Station. We are, as mentioned earlier, assigned the call
letters "WAH" with an alternate call of "Virgin Islands
Radio". We operate as a local VHF station, Coastal station,
and High Seas Station, and as such cover the US Virgin
Islands, Puerto Rico, the Caribbean and Atlantic very effec-
tively.

12.3 We believe that if accounting authorities are required
to follow our recommendations that a great deal of confusion
and uncertainty can be eliminated. The direct results of
this will be clearer records and internal accounting for all
involved, including making it easier and quicker for The
Federal Communications Commission to audit and review an
AAIC's performance.

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13 OUR SPECIFIC RECOMMENDATIONS ON SHIPS LISTS FOR
INCLUSION IN THE NEW CFR 47 PART 3 ARE AS FOLLOWS.

13.1 Accounting authorities must be required to publish lists of ships that they accept quarterly or preferably monthly. For this list to be useful it must be kept updated REGULARLY. These lists must also be clearly printed and legible.

Ref. Our Part One of this reply, paragraphs 6.2 , 6.6 , 6.7 and 6.8 .

13.2 Lists must if more than 100 entries long be available on computer floppy disks for IBM¹ personal computers. This will make it very much easier for coast stations to setup computer data bases to verify vessels and to do so much more accurately also. We believe that if an authority has more than 200 vessels that it will be cheaper to prepare and mail a computer disk than to prepare, print and mail a paper list. Additionally this will show a saving in energy and trees cut down.

Ref. Our Part One of this reply, paragraphs 6.5 , 6.6 and 6.8 .

13.3 Accounting authorities should if they have more than 100/200 vessels under them, maintain a "800" number that is manned 24 hrs a day for coast stations to call. This way vessels that have just come under that authority can be serviced by coast stations prior to the authority updating its lists.

1. IBM is the registered trademark of The International Business Machines Corporation.

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13.4 Authorities instead of providing lists/floppy disks of vessels that they accept could instead establish an inward "800" number to a computer for coast stations to access the list of vessels. This at the same time would provide 24 hr. access for a coast station for verifying a new vessel. Thus making it unnecessary to incur the expense of a 24 hr operator to verify new vessels.

13.5 SUMMARY OF OUR RECOMMENDATIONS REGARDS SHIPS STATIONS LISTS. We recommend that accounting authorities be required to do the following:

- 13.5.1 Maintain and publish lists of vessels that they are responsible for.
- 13.5.2 Keep these lists up to date quarterly or monthly and to send these lists to coast stations on request.
- 13.5.3 To make these lists available in a personal computer format.
- 13.5.4 To provide a 24 hr hot line for coast stations to verify new listings.

All of the above can be combined to together by requiring the following:

- 13.5.5 REQUIRE ACCOUNTING AUTHORITIES TO PROVIDE A INWARD "800" NUMBER THAT OPERATES 24 hrs A DAY PERMITTING COAST STATIONS TO DOWN LOAD BY COMPUTER THE LISTS OF VESSELS THAT THEY TAKE RESPONSIBILITY FOR AND THAT MAY ALSO BE USED TO VERIFY NEW LISTINGS.

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14 OUR SPECIFIC RECOMMENDATIONS ON PAYMENTS FOR
INCLUSION IN THE NEW CFR 47 PART 3 ARE AS FOLLOWS.

14.1 It is very important that accounting authorities acknowledge receipt of coast station invoices within 10 to 30 days, or sooner if possible. This assures the coast station that the invoice has been received.

Ref. Our Part One of this reply, Paragraphs 6.12 and 6.13 .

14.2 It is equally important that the accounting authority in 30 days or less notifies the coast station of rejections. This way the coast station can rebill the calls. Along with the rejections notice it is extremely helpful to indicate (If the authority knows) the new accounting authority of the rejected vessel.

Ref. Our Part One of this reply, Paragraphs 6.12 , 6.13 , 6.14 , 6.15 and 6.16 .

14.3 Were it possible to some how maintain a common data base of vessels that have unpaid balances with AAIC's, this would prevent vessels skipping between authorities to avoid payment. This seems to be outside of what can be addressed in this rule making though.

Ref. Our Part One of this reply, Paragraphs 6.14 , 6.16 and 6.17 .

14.4 In the event that a vessel has signed with an authority that defaults on its payments it is very helpful to the coast station for that authority or the authorities that later assume responsibility for the vessels to provide the

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addresses of the owners/operators of the vessels. This permits the coast station to direct bill for the charges due. Naturally if the vessel is of US registry the addresses are available from the Names and Call Signs List for the USA.

Ref. Our Part One of this reply, Paragraphs 6.14 , 6.16 and 6.17 .

- 14.5 Due to the very low cost of issuing a check by a US company to another US company, US accounting authorities should pay even small value invoices within the ITU guidelines. But some consideration might be made for payments to overseas administrations or overseas coast stations if the authority or station has been advised and if they agree to the terms of the delay. This should be done on an invoice by invoice basis.

Ref. (a) Our Part One of this reply, Paragraph 8.7 .

(b) Letter received from GR05 attached at the end of this reply.

- 14.6 Accounting authorities when paying invoices must clearly state which invoices are being paid. It does not matter to us if invoices are paid in sequence or lumped together so long as the paying authority clearly states the exact invoices being paid.

Ref. Our Part One of this reply, Paragraphs 9.3 , 9.4 and 9.5 .